

SEALED

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

FILED**July 24, 2020**KAREN MITCHELL
CLERK, U.S. DISTRICT COURTUnited States of America
v.

DANIEL LEE COLLINS

Case No.

3:20-MJ-762-BN

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 29, 2020 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 2252(a)(1)

Transportation of child pornography

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.*Complainant's signature*

Eric Weast, TFO HSI

*Printed name and title*Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1. 

Date:

7/24/2020*Judge's signature*City and state: Dallas, Texas

DAVID L. HORAN, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

No. 3:20-MJ-

Daniel Lee COLLINS

CRIMINAL COMPLAINT

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about June 29, 2020, **Daniel Lee Collins**, the defendant, knowingly transported any visual depiction using any means or facility of interstate or foreign commerce, including by computer, knowing the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.

Specifically, **Collins** utilized a cellular phone and the Internet to transport the following image and video in violation of 18 U.S.C. § 2252(a)(1):

File Name	File Description
[redacted]088249340	This image depicts a prepubescent female child engaged in anal-genital sexual intercourse with an adult male.
[redacted]88035709fbab	This video depicts a prepubescent female child engaged in oral-genital sexual intercourse with an adult male.

I further state that I am a Task Force Officer (TFO) of the United States Department of Homeland Security, Homeland Security Investigations (HSI), and that this complaint is based on the following facts gathered through an investigation I have conducted, my training and experience, and information provided to me by other law enforcement officers.

INTRODUCTION

1. I am a Task Force Officer (TFO) with the United States Department of Homeland Security, Homeland Security Investigations (HSI), and I am employed as a Police Detective with the Dallas Police Department¹. As a TFO, I am currently assigned to the HSI Dallas Field Office, Child Exploitation Group, where my duties include, but are not limited to, the investigation and enforcement of Titles 18 and 19 of the United States Code (U.S.C.). As a TFO with HSI, I am authorized to conduct investigations of federal offenses, apply for search warrants, and make arrests for federal violations.

2. Based on my training and experience, I am aware that it is a violation of 18 U.S.C. § 2252(a)(1) for an individual to knowingly transport child pornography using any means or facility of interstate commerce, including by computer.

OVERVIEW OF INVESTIGATION

3. In July 2020, the National Center for Missing and Exploited Children (NCMEC²) assigned multiple CyberTipline Reports (CT Reports) to the Dallas Police Department's Internet Crimes Against Children (ICAC) squad, for follow-up investigation. Collectively, the CT Reports were filed by Google and related to an individual who utilized multiple Google user accounts to upload child pornography.

4. In multiple CT Reports, Google reported that on or about May 13, 2020, the user of account "DCollins[redacted]@gmail.com" uploaded an image depicting child pornography to the account. In the subscriber information provided for this account,

¹ The police department of the City of Dallas, Texas

² NCMEC serves as a national clearinghouse that collects, gathers, analyzes, and reports information regarding missing and sexually exploited children for private companies and law enforcement.

Google reported that the name provided for this account user was “Dan Collins,” and the telephone number associated with the account was listed as “+1 [redacted]-5393”. In the CT Report, Google provided an image stored in the account of a male dressed in a police uniform, which was later identified as that of the Dallas Police Department. During the investigation into this matter, I reviewed the specific image flagged as child pornography by Google, which is described as follows:

File Name	File Description
[redacted]576428155	The image depicts a nude female minor posed in a sexually suggestive manner with her underwear pulled down around her thighs. Her genitals are exposed to the camera, which is the focus of the image.

Based on my training and experience, this image meets the federal definition of child pornography found in 18 U.S.C. § 2256.

5. In other CT Reports, Google reported that on or about June 29, 2020, the user of account “sweetdannie[redacted]@gmail.com” uploaded several images and videos depicting child pornography to the account. In the subscriber information, Google reported that the name listed for this account was “John Smith.” During the investigation into this matter, I reviewed the specific files reported by Google in the CT Reports, and observed multiple images and videos depicting child pornography, including the following:

File Name	File Description
[redacted]088249340	This image depicts a prepubescent female child engaged in anal-genital sexual intercourse with an adult male.

[redacted]88035709fbab	This video depicts a prepubescent female child engaged in oral-genital sexual intercourse with an adult male.
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Based on my training and experience, these files meet the federal definition of child pornography found in 18 U.S.C. § 2256.

6. The CT Reports filed by Google included login records for the flagged accounts, as well as transactional records relating to the uploaded files. Collectively, the CT Reports showed each of the reported Google accounts uploaded child pornography and/or were accessed using IP addresses 66.97.145.65 and 66.97.145.64. During the investigation, a City of Dallas Information Security Manager reported that these IP addresses are associated with the City of Dallas network, which is normally utilized by employees and contractors, to include individuals working for the Dallas Police Department.

7. Furthermore, the subscriber information for the flagged accounts indicated each of the accounts was accessed by IPv6³ addresses beginning with the four hexets 2600:1700:2910:3650 in April, May, and June 2020. Between July 13, 2020 and July 16, 2020, Dallas Police Department detectives served multiple administrative subpoenas to AT&T for subscriber records relating to the customer account(s) assigned these IP addresses on the respective dates and times they were used to access the reported Google accounts. AT&T subsequently responded with records showing that all of the requested

³ IP version 6, or "IPV6", is the most recent IP address standard, which was developed to address the impending shortage of unique IPv4 (traditional) IP addresses. In short, available IPv4 addresses were near exhaustion, so network engineers developed a new IP address version for network communication intended to eventually replace IPv4.

IP addresses were assigned to the Internet services at **Collins'** residence in Mansfield, Texas.

8. The CT Reports show that the Google account "sweetdannie[redacted]@gmail.com" was accessed from an IPv6 address beginning with the hexets 2600:1700:2910:3650, and therefore from Mansfield, Tarrant County, Texas, on May 25, 2020. In addition, the account "DCollins9304@gmail.com" was also accessed from an IPv6 address beginning with the hexets 2600:1700:2910:3650, and therefore from Mansfield, Tarrant County, Texas on April 24, 2020.

9. On July 14, 2020, Dallas Police Department detectives served a State of Texas search warrant on AT&T for subscriber and call detail records relating to cellular telephone number [redacted]-5393 (the phone number associated with Google account "DCollins[redacted]@gmail.com"). AT&T subsequently responded with records showing the assigned user as "**Daniel L. Collins**" with a service start date of October 19, 2010. Call detail records and other data indicates the user's cellular phone, an Apple iPhone 8, was communicating with towers near Dallas Police Headquarters when child pornography was reportedly uploaded to the flagged accounts on May 13, 2020 and June 29, 2020, using a City of Dallas IP addresses.

10. I obtained Dallas Police personnel records, which revealed Collins listed his home address as [redacted] Court, Mansfield, Texas, and listed his telephone number [redacted]-5393. Furthermore, the personnel database contained a photograph of **Collins**, which appeared to be the same person depicted in the photograph stored in the account "DCollins[redacted]@gmail.com" account.

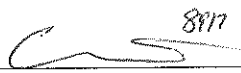
11. Based in part on this information, on July 22, 2020, I obtained search warrants for **Collins**' residence and his workplace at Dallas Police Headquarters. On July 23, 2020, HSI formulated plans to make contact with **Collins** at Dallas Police Headquarters, while a group of agents executed a federal search warrant at his residence in Mansfield and I executed a federal search warrant at his workplace.

12. During a post-Miranda interview, **Collins** admitted to controlling and accessing the Google accounts "DCollins[redacted]@gmail.com" and "sweetdannie[redacted]@gmail.com", which were used to upload child pornography. He also admitted to saving child pornography from the reported Google accounts. Collins further admitted to using an Apple iPhone 8 to access and save child pornography from the reported Google accounts.

13. Based on my training and experience, I am aware that use of Google's services, including uploading digital files via Gmail or Google Photos, requires use of the Internet, a means and facility of interstate and/or foreign commerce. Furthermore, I know based on my training and experience that the Apple iPhone used by **Collins** to transport child pornography was assembled outside the State of Texas. Therefore, for the device to be present in the Northern District of Texas, there is probable cause to believe that the device itself travelled in and affecting interstate and foreign commerce.

CONCLUSION

13. Based on the facts set forth in this affidavit, I respectfully submit there is probable to believe that on or about June 29, 2020, **Daniel Lee Collins** knowingly transported any visual depiction of a minor engaged in sexually explicit activity, using any means or facility of interstate and/or foreign commerce, in violation of 18 U.S.C. § 2252(a)(1).


Eric Weast, Task Force Officer
Homeland Security Investigations

Sworn to before me and subscribed in my presence this 24th day of July 2020, at 10:00 a.m./~~p.m.~~ in Dallas, Texas. Affiant's signature confirmed via reliable DLH electronic means pursuant to Fed. R. Crim. P. 4.1.


DAVID L. HORAN
UNITED STATES MAGISTRATE JUDGE